

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

W.R. GRACE & CO., *et al.*,<sup>1</sup>

Reorganized Debtors.

Chapter 11

Case No. 01-01139 (AMC)

(Jointly Administered)

**NOTICE OF APPEARANCE AND REQUEST  
FOR SERVICE PURSUANT TO FED. R. BANKR. P. 2002**

**PLEASE TAKE NOTICE** that, pursuant to Rules 2002, 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 102(1) of title 11 of the United States Code, §§ 101–1532, as amended (the “Bankruptcy Code”), Bayard, P.A. (“Bayard”), Goodwin Procter LLP (“Goodwin”) and Ford Marrin Esposito Witmeyer & Gleser, LLP (“Ford Marrin”), hereby enters their appearance in the above-referenced chapter 11 cases (the “Chapter 11 Cases”) as counsel to Continental Casualty Company and Transportation Insurance Company, (collectively “Continental Casualty”), and hereby requests, pursuant to Bankruptcy Rules 2002, 3017, and 9007 and section 342 of the Bankruptcy Code, and the *Order Authorizing the Elimination of the Existing 2014 Service List and the Creation of a New Service List* [D.I. 33138], that they be added to the new service list and that copies of all notices and pleadings given or required to be given in the Chapter 11 Cases and copies of all papers served or required to be served in the Chapter 11 Cases, including but not limited to all notices (including those required by Bankruptcy Rule 2002), reports, pleadings, motions, applications, lists, schedules, statements, chapter 11 plans, disclosure statements, and all other matters arising herein or in any related adversary proceeding, be given and served upon Continental Casualty

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<sup>1</sup> The Reorganized Debtor is W.R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.)

through service upon Bayard, Goodwin and Ford Marrin at the address, emails, and/or facsimile number set forth below:

BAYARD, P.A.  
Scott D. Cousins  
Evan T. Miller  
Sophie E. Macon  
600 N. King Street, Suite 400  
Wilmington, DE 19801  
Telephone: (302) 655-5000  
Facsimile: (302) 658-6395  
Email: scousins@bayardlaw.com  
emiller@bayardlaw.com  
smacon@bayardlaw.com

GOODWIN PROCTER LLP  
Michael S. Giannotto  
Brian T. Burgess  
1900 N. Street NW  
Washington, DC 20036  
Tel.: (202) 346-4000  
Fax: (202) 346-4444  
Email: mgiannotto@goodwinlaw.com  
bburgess@goodwinlaw.com

FORD MARRIN ESPOSITO WITMEYER &  
GLESER, LLP  
Elizabeth DeCristofaro  
Wall Street Plaza, 23rd Floor  
New York, NY 10005  
Tel.: (212) 269-4900  
Fax: (212) 344-4294  
Email: edecristofaro@fordmarrin.com

**PLEASE TAKE FURTHER NOTICE** that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, complaint or demand, motion, petition, pleading or request, and answering or reply papers filed in these cases, whether formal or informal, written or oral, and whether served, transmitted, or conveyed by mail, hand delivery, telephone, telegraph, or otherwise filed or made with regard to the Chapter 11 Cases and proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive Continental Casualty's: (i) right to have a final order in non-core matters entered only after *de novo* review by a United States District Court Judge; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the

reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Continental Casualty is or may be entitled to under agreements, in law, or equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are hereby expressly reserved.

Dated: November 19, 2019  
Wilmington, Delaware

BAYARD, P.A.

/s/ Evan T. Miller

Scott D. Cousins (No. 3079)  
Evan T. Miller (No. 5364)  
Sophie E. Macon (No. 6562)  
600 N. King Street, Suite 400  
Wilmington, DE 19801  
Tel.: (302) 655-5000  
Fax: (302) 658-6395  
scousins@bayardlaw.com  
emiller@bayardlaw.com  
smacon@bayardlaw.com

- and -

Michael S. Giannotto, Esq.  
Brian T. Burgess, Esq.  
GOODWIN PROCTER LLP  
1900 N. Street, NW  
Washington, DC 20036  
Tel.: (202) 346-4000  
Fax: (202) 346-4444

- and -

Elizabeth DeCristofaro, Esq.  
FORD MARRIN ESPOSITO WITMEYER &  
GLESER, LLP  
Wall Street Plaza, 23rd Floor  
New York, NY 10005  
Tel.: (212) 269-4900  
Fax: (212) 344-4294

*Counsel to Continental Casualty Company and  
Transportation Insurance Company*